

TSD File Inventory Index

Date: June 7, 2004

Initial: C.M. Hernandez

Facility Name <u>Dave Corporation (Pacifi-Cycle Division)</u>			
Facility Identification Number <u>MID 988 499 735</u>			
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Note Transmittal Letter to Be Included with Reports.
Comments _____

EPA

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

State Office Building
350 Ottawa, N.W.
Grand Rapids, Michigan 49503

May 31, 1990

Mr. Bruce Tiejema
Sealed Power Technologies, L.P.
2001 Sanford Street
Muskegon Heights, MI 49443

RE: MID980499735

Dear Mr. Tiejema:

On May 30, 1990, staff of the Department of Natural Resources conducted an investigation of your facility located at 2001 Sanford Street, Muskegon Heights, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and with Michigan Act 64, P.A. 1979. The completed inspection form is enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in compliance with the requirements of Subtitle C of RCRA and Act 64 which were addressed by the enclosed inspection forms.

The enclosed forms are to be used by the company to prepare a new financial test document for 1990. The company has used the financial test to demonstrate financial capability for closure costs and liability coverage as required by Act 64 and RCRA. Such financial assurance is required until closure is completed and the company is formally released from this requirement. Please have the appropriate personnel complete the forms and return them to our office as soon as possible.

If you have any questions regarding this matter please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, reading "Dale M. DeKraker".

Dale M. DeKraker
Environmental Quality Analyst
Waste Management Division
616-456-5071

DMD/bls
Enclosure



RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility:

SEALED Power Technologies, L.P.

U.S. EPA I.D. No. :

MTD 980499-735

Street:

2001 SANFORD

City:

MUSKEGON HTSState: MIZip: 49443

Telephone:

616-724-5577

Owner/Operator:

Street:

SEALED Power Technologies, L.P.

City:

2025 SANFORDState: MIZip: 49443

Telephone:

616-724-5577

Inspection Date:

5/30/90Time: 9:00 - 11:00

Weather Conditions:

CLEAR, MILD

Inspectors:

Name

Agency/Title

Telephone

DALE DeKiehnMDNR616-456-5071Facility
Representative:HAROLD LARABEESR PLANT ENGINEER616-724-5577

F-Solvent

GenerateTransportTreatStoreDispose✓

Dioxin

California List

First Third

Second Third

INSPECTION SUMMARY

Processes That Generate LDR Wastes

FOO1 WASTE (TRICHLOROETHYLENE) IS GENERATED FROM DEGREASING OPERATIONS. FOO1 STILL BOTTOMS FROM RECLAIMING OF FOO1 SOLVENT IS ALSO GENERATED. STILL BOTTOM GENERATION RATE IS ~ 2 drums/mo.

SOME FOO2 (METHYLENE CHLORIDE) WASTE IS ALSO GENERATED FROM STRIPPING OPERATIONS.

LDR Waste Management

ALL WASTES ARE EITHER SENT FOR RECLAIM OR INCINERATION. DRUMS ARE HELD IN ACCUMULATION AREA FOR < 90 DAYS.

Summary

NO VIOLATIONS WERE OBSERVED.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* F001, F002

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☐ No ☒ List* _____

d. First and Second Third Wastes

Yes ☐ No ☒ List* _____

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).
Yes ☐ No ☒ Comments _____
- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).
Yes ☐ No ☒ Comments _____
- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).
Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☒ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

FOOD & FOOD - KNOWLEDGE THAT WASTE
WOULD FAIL TCLP - PURE SOLVENTS

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐ (MSD sheets)

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

(None)

- Total constituent analysis Yes ☐ No ☐ NA ☒

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH ≤ 2 Yes ☐ No ☐ NA ☒

List the wastes for which pH testing was used.

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒ Comments _____

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
FOO1-FOO2	Detrex Corp.	RECLAIM
_____	_____	_____
_____	_____	_____

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility
_____	_____
_____	_____
_____	_____

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ☐ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☐ No ☐

Applicable treatment standards and prohibition levels Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Certification that the waste meets treatment standards Yes ☐ No ☐
[wording in 268.7(a)(2)(ii)]

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ☐ No ☒ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ☐ No ☐

- Does the notification contain the following information?

EPA hazardous waste number Yes ☐ No ☐

The corresponding treatment standards and all applicable prohibitions Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Date the waste is subject to the prohibitions Yes ☐ No ☐

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ☐ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes	___	No	___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes	___	No	___
(iii)	Manifest number	Yes	___	No	___
(iv)	Waste analysis data, if available	Yes	___	No	___

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?
- Yes ___ No ___
- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- Yes ___ No ___
- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?
- Yes ___ No ___
- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes	___	No	___
Addresses	Yes	___	No	___
Telephone numbers	Yes	___	No	___
Contact dates	Yes	___	No	___
Certification statement	Yes	___	No	___

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes _____ No _____ NA _____

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes _____ No _____

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes _____ No _____

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes No NA

4. Records Retention.

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☒ No ☐

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
FOO1	RECLAIM	DISTILLATION UNIT
DOO2	NEUTRALIZATION	(WWT)

2. Are treatment residuals generated from these units?

Yes ☒ No ☐ Comments FOO1 STILL BOTTOMS

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
J. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 616-456-5071
July 14, 1986

Mr. Danial T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

RE: MID 980499735

Dear Mr. Girvan:

This correspondence is written to acknowledge receipt of your letter dated July 11, 1986, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on March 14, 1986. Our inspection on July 11, 1986, has confirmed correction of the violations.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of March 17, 1986, with regard to the Resource Conservation and Recovery Act.

Sincerely,

A handwritten signature in cursive script that reads "Dale M. DeKraker".

Dale M. DeKraker
Environmental Quality Analyst
Hazardous Waste Division

DMD/mn

cc: M. Murphy, U.S. EPA Region V (w/enc.)

SEALED POWER

July 11, 1986

RECEIVED
HAZARDOUS WASTE DIVISION

JUL 14 1986

GRAND RAPIDS

Dale DeKraker
Hazardous Waste Division
Department of Natural Resources
State Office Building
350 Ottawa N.W.
Grand Rapids, MI 49503

MID 980499735

Dear Mr DeKraker:

On June 24, 1986, the drums of solvent which had been stored more than 90 days were shipped to a hazardous waste fuel blender for disposal. At this time, all hazardous wastes in storage at our Sanford Street facility are within the 90 day RCRA limit.

Sincerely

Dan Girvan

Daniel Girvan
Environmental & Energy Manager

DG:jc

XC: EPA REGION 2

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
C. STEWART MYERS
D. D. OLSON
MOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 456-5071
March 17, 1986

Mr. Danial T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

RE: MID 980499735 (Sanford Street Plant)

Dear Mr. Girvan:

On March 14, 1986, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 2001 Sanford Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirements were not being met:

- 1) The company has not been analyzing its hazardous waste solvents in accordance with its waste analysis plan. This requirement is outlined in 40 CFR, Part 265.13 of RCRA.
- 2) The company's closure plan does not include a time estimate for each step in the closure procedure nor is there evidence that the cost estimate of closure has been adjusted annually for inflation as required by 40 CFR, Part 265.112 of RCRA.
- 3) A number of containers of the company's own generated hazardous wastes have been stored well in excess of the 90 day time limit established by statute, primarily the result of a recent waste load rejection by the disposal facility. Since your existing Part A does not authorize such activity, Sealed Power is obligated to file an amended Part A as well as to apply for an Act 64 storage facility operating license, should this activity continue.

Page 2
Sealed Power Corporation
RE: MID 980499735 (Sanford Street Plant)
March 17, 1986

We request that you respond to this letter by April 4, 1986, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to May 1, 1986. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,



Dale M. DeKraker
Environmental Quality Analyst
Hazardous Waste Division

DMD/mn

cc: M. Murphy, U.S. EPA, Region V (w/enc.)

Enclosure

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 616-456-5071
May 12, 1986

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
STEWART MYERS
VID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

Mr. Daniel T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

CERTIFIED MAIL

RE: SECOND LETTER OF WARNING
MID 980499735

Dear Mr. Girvan:

On March 14, 1986, staff of the Department of Natural Resources conducted an inspection on behalf of the United States Environmental Protection Agency at your facility located at 2001 Sanford Street, Muskegon, Michigan.

The inspection revealed that your facility was in violation of the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. As a result, this office sent your facility a deficiency letter dated March 17, 1986, (copy attached) specifying the observed violations. The response date in the letter, by which time the company was to have corrected all violations, was May 1, 1986.

In a response letter dated April 11, 1986, Sealed Power outlined steps to be taken to correct the observed violations. To date, we have no written confirmation that violations noted during the inspection have been corrected. A copy of the analysis on the still bottom waste was to have been sent upon completion but we have not received that information.

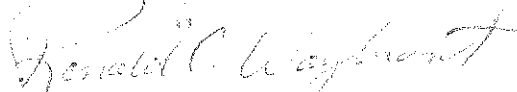
Further, a copy of the revised closure plan was to have been sent but was not received. Finally, some containers of hazardous waste which were found to be stored for greater than 90 days apparently are still on-site, although a recent telephone conversation indicated that many of these containers have now been sent off-site for disposal. Nevertheless, those containers remaining on-site are still in violation of the 90 day limit rule.

Page 2
Sealed Power Corporation
SECOND LETTER OF WARNING - MID 980499735
May 12, 1986

Therefore, this letter is to inform you that if the violations are not completely addressed by June 10, 1986, this matter will be referred to the U.S. EPA for enforcement actions and for penalty assessment pursuant to Section 3008(c) and (g) of RCRA. For each day of continued non-compliance, your company may be subject to a civil penalty of up to \$25,000,00.

If you have any questions, please contact this office.

Sincerely,



Ronald C. Waybrant, Ph. D.
District Supervisor
Hazardous Waste Division

RCW/mn

cc: M. Murphy, U.S. EPA, Region V
J. Bohunsky/C&E file, HWD

Attachment

RCRA Inspection Report

EPA Identification Number: M I D 9 8 0 4 9 9 7 3 5

Installation Name: SEALED POWER CORPORATION

Location Address: 2001 SANFORD STREET

City: MUSKEGON

State: MICHIGAN

Date of inspection: 3-14-86

Time of inspection (from) 9:30AM (to) 12:15PM

Person(s) interviewed

Title

Telephone

DANIAL T. GIRVAN

ENVIRONMENTAL AND
ENERGY MANAGER

616-724-5011

Inspector(s)

Agency/Title

Telephone

DALE DEKRAKER

MICHIGAN DNR

616-456-5071

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

(A)

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendices.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	<u>J</u>
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	<u>GN</u>
TRANSPORTER	<input checked="" type="checkbox"/>	APPENDIX	<u>TR</u>

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	✓	NO FOREIGN WASTES
b. Facility expansion?	—	—	✓	NO EXPANSIONS
c. Change of owner or operator?	—	—	✓	NO CHANGES
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	✓	—	ANALYSIS HAVE NOT BEEN PERFORMED
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	✓	—	—	SECURITY SERVICE
or				
b. i. Artificial or natural barrier around facility?	✓	—	—	FENCE
and				
ii. Controlled entry?	✓	—	—	
c. Danger sign(s) at entrance?	✓	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓	—	—	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TANK LEVEL
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GUARD SERVICE
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DAILY, WEEKLY
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	KEPT BY STILL OPERATOR
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4/82-A

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

___ ☒ ___

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

☒ ___

FIRE ALARMS
SPRINKLER SYSTEM

b. Telephone or 2-way radios
at the scene of operations?

☒ ___

TELEPHONES

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ___

ALL EQUIPMENT

Indicate the volume of water and/or foam available for fire control:

CITY AND WELLS - SUPPLY ADEQUATE

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ ___

QUARTERLY

b. Is emergency equipment
maintained in operable
condition?

☒ ___

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

☒ ___

WITHIN 40 FEET

5. Is there adequate aisle space
for unobstructed movement?

☒ ___

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ ___

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	UPDATING REQUIRED
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HOWEVER NATURE OF WASTE NOT LIKELY TO CAUSE EVACUATION
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

YES NO NI Remarks

Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓ Mr HAROLD LARABEE

✓

✓

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

 ✓ NO EMERGENCY HAS
EVER OCCURRED.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** .. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ONLY ONE LOCATION</u>
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

___ ___ ☒

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

___ ☒ ___

WASTE ANALYSIS NOT AVAILABLE

v. Reports detailing all incidents that required implementation of the Contingency Plan?

___ ___ ☒

vi. All closure and post closure costs as applicable?

☒ ___ ___

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

☒ ___ ___

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

___ ☒ ___

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part I Subpart G)

YES NO NI Remarks

1. Closure 265.112

CLOSURE PLAN NOT
UPDATED ANNUALLY.

a. Is the facility closure
plan available for inspection?

✓

b. Does the plan identify:

i. maximum extent unclosed dur-
ing facility life?

✓

100%

ii. maximum hazardous waste in-
ventory?

✓

3000 GALLONS

iv. estimated year of closure?

✓

2005 A.D.

v. schedule of closure activities?

✓

REQUIRES TIME ESTIMATES
FOR EACH STEP

c. Has closure begun?

✓

*2. Post-Closure 265.118

a. Is the post-closure plan available
for inspection?

b. Does this plan contain:

i. description of groundwater
monitoring activities and
frequencies?

ii. description of maintenance
activities and frequencies
for

AA. integrity of cap, final
cover, or containment
structures, where appli-
cable

BB. facility monitoring equip-
ment

iii. name, address, and phone number
of person or office to contact
during post-closure care period?

c. Has the post-closure period begun?

d. Is the written post-closure cost
estimate available? 265.144

Applies only to disposal facilities.

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192

✓ — —
FOOT STILL BOTTOMS
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?

✓ — —
CONTAINED, COVERED
3. Do continuous feed systems have a waste-feed cutoff?

— — ✓
BATCH ADDITION
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193

— —
✓ TANK DEDICATED TO SAME WASTE
5. Are required daily and weekly inspections done? 265.194

✓ — —
— —
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

— —
✓ N/A
7. Are incompatible wastes stored in separate tanks? 265.199
 (If not, the provisions of 40 CFR 265.17(b) apply.)

— —
✓ N/A
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line N/A feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>60</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>SHORELINE WASTE TRANSPORT</u>
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>TRICIL ROSS AND SONS</u>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>CORROSIVE ORM-A</u>
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OVER -LIMIT DUE TO REJECTION OF RECENT SHIPMENT.
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?				<u>✓</u>
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				

Appendix TR

Section A: SCOPE:

YES NO NI Remarks

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

COMPANY TRANSPORTS EOOI
WASTES FROM ITS OTHER PLANTS
TO SANFORD STREET FOR
FURTHER RECLAIM.

✓ — —
— ✓ —
— ✓ —
— ✓ —

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the part 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

✓ — —
25
10
✓ — —
— ✓ —
— — —
— — —
— — —

Rich

SEALED POWER

MID 980499735

October 28, 1985

RECEIVED

NOV 12 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Regional Administrator
Region V
United States E.P.A.
230 South Dearborn Street
Chicago, IL 60604

Gentlemen:

This letter is to inform you of a manifest exception. On July 16, 1985, our Franklin, Kentucky, plant sent three drums of trichloroethylene to our Sanford Street plant in Muskegon, Michigan, using Manifest No. 0525755 to be recycled. When the drums arrived at the Sanford Street plant, they were unloaded in the shipping department to await pickup by the maintenance department. The manifest was with the drums at this time. The drums were subsequently picked up by the maintenance department and taken to the recovery still for recycling. At the time this shipment was received, there were some personnel changes taking place in the shipping department. In the confusion that ensued, the manifest was separated from the drums, and we are now unable to locate any copies of the manifest.

Because of this situation, we are unable to administratively verify, through the use of paperwork, that the material was properly handled. However, in discussing the situation with all involved personnel, I am 100% sure that the trichloroethylene was indeed properly handled and recycled.

If you have any questions, please call me at 616/724-5788. Thank you.

Sincerely,

Paul A. Parker

Paul A. Parker
Administrative Assistant

0642/mtm

cc: D. Girvan
C. Kirby

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
J. J. FLUHARTY
HEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 456-5071
April 16, 1985

Mr. Danial T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

RE: MID 980499735 (Sanford Street Plant)

Dear Mr. Girvan:

This correspondence is written to acknowledge receipt of your letter dated April 1, 1985, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on March 6, 1985.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of March 13, 1985, with regard to the Resource Conservation and Recovery Act.

Sincerely,

A handwritten signature in cursive script that reads "Dale M. DeKraker".

Dale M. DeKraker
Water Quality Specialist
Hazardous Waste Division

DMD/mn

cc: EPA Region V (w/enc.)
Al Howard, HWD
J. Bohunsky/C&E file, HWD

RECEIVED

APR 2 1985

HAZARDOUS WASTE DIVISION

April 1, 1985

SEALED POWER

Ronald C. Waybrant, Ph.D.
District Supervisor
Hazardous Waste Division
Department of Natural Resources
State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503

Dear Dr. Waybrant:

Re: MID 980499735

During the hazardous waste storage facility inspection of our Sanford Street plant, three items were noted which we have since corrected.

- (1) A detailed waste analysis plan is now in place at the facility and will soon be implemented.
- (2) The format for a written inspection schedule has been developed and is now in place at the facility and is being initialed on a daily basis by the inspector.
- (3) A format for an operating record has been developed and is also in use at the facility.

Copies of all three of these items have been attached to this letter for your inspection. I believe that these forms cover all of the pertinent points, but if you feel that something else should be added, please let us know.

I believe that these actions will satisfy the concerns expressed in your March 13, 1985, letter and that we are now operating in compliance with all applicable rules.

Sincerely,

Dan Girvan

Daniel T. Girvan
Environmental and Energy Manager

0318/mtm

Attachments

cc: EPA REGION K

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
J. ENE J. FLUHARTY
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HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 456-5071
March 13, 1985

Mr. Danial T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

RE: MID 980499735

Dear Mr. Girvan:

On March 6, 1985, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 2001 Sanford Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirement(s) were not being met:

- 1) The company does not have a detailed waste analysis plan at the facility as required by 40 CFR, Part 265.13(b).
- 2) The company does not have a written inspection schedule available at the facility as required by 40 CFR, Part 265.15(b). Also, the existing inspection log does not include the name of the inspector or the date and nature of remedial actions as required by 40 CFR, Part 265.15(d).
- 3) The facility has no operating record as required by 40 CFR, Part 265.73.

We request that you respond to this letter by April 1, 1985, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to May 1, 1985. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

Page 2
Sealed Power Corporation
March 13, 1985

If you have any questions, feel free to contact Dale DeKraker and address your response to the address on this letter.

Sincerely,

Ronald C. Waybrant

Ronald C. Waybrant, Ph.D.
District Supervisor
Hazardous Waste Division

RCW/DMD/mn

cc: EPA Region V (w/enc.)

Enclosure

BOHNSIG / GTE
AK Howard

*File*

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
J. R. CAROLLO
JACOB A. HOEFER
STEPHEN E. MONSMA
MARY F. SNELL
PAUL H. WENDLER
GARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

350 Ottawa Avenue, N. W.
Grand Rapids, Michigan 49503

March 12, 1984

Mr. Daniel T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

T
MI 870 910 580

Dear Mr. Girvan:

The purpose of this letter is to document our discussions on March 7, 1984 at your Sanford Street facility regarding the company's current practice of recycling its waste trichloroethylene still bottoms. This arrangement involves the transport of this waste from various Sealed Power facilities to the Sanford Street facility where it is further distilled to recover additional material. The clean solvent is then returned to stock for re-use and the remaining by-product oil sold for fuel.

While this activity is clearly exempt from regulation under Act 64 at the present time, there has been some uncertainty with respect to regulation under RCRA. 40 CFR, Part 261.6(b) clearly requires that certain listed hazardous wastes be regulated even if they are to be recycled. Trichloroethylene still bottoms (F002) is one such hazardous waste and thus, regulations for the generation, transportation, and storage of this waste would normally be in full effect.

However, there has been some on-going question if the material constitutes a waste per se, or an in-process material. Sealed Power has taken the position that it is an in-process material and hence has not been applying RCRA regulations to the process. In discussion with EPA, however, we have been informed that this procedure is regulated and falls within the intent of the RCRA statute. Therefore, to gain compliance and to continue to operate under the existing format, the following adjustments must be made in the recycling operation:

1. Those facilities currently generating the material must include it in their hazardous waste volume determinations and begin to handle the material as a bona fide hazardous waste. Accumulation time limits, container/tank labeling requirements, and other requirements outlined in 40 CFR, Part 262 of RCRA (generator section) now apply. In addition, a manifest must now be utilized by each facility to transport the waste to the Sanford Street plant.

Mr. Daniel T. Girvan
3/12/84
page two

2. The waste must be transported by the company's licensed hazardous waste transport vehicles, using the manifest previously indicated.
3. The receiving facility (Sandford Street) must obtain interim status to receive and store the waste prior to reclamation. The current Part A application lists only a T01 process code and does not authorize any storage activity. Consequently, the existing Part A must be amended to permit this activity. We recommend that a letter of explanation also be sent to EPA along with the revised application so that they are aware of the situation. Mr. Joe Boyle (312-886-7457) should be contacted with any questions about this revision. The Sanford Street facility will also be required to comply with the applicable Part 265 standards for TSD operations such as closure plans, financial insurance, inspection schedules, logs, etc.

While some of these requirements are already being met (contingency plan, personnel training) there will obviously be some increased documentary requirements. It was agreed that the company would review the requirements of Parts 264 and 265 and then decide on a final course of action. We would request that this question be resolved by not later than April 1, 1984, and a written response be filed with our office by this time.

If you should have additional questions, please contact our office.

Sincerely,

Dale M. DeKraker

Dale M. DeKraker, Water Quality Specialist
Hazardous Waste Division
(616) 456-5071

DMD:bjc

EPA-Region IV

RCRA Inspection Report

E Identification Number: M I D 9 8 0 4 9 9 7 3 5

Installation Name: SEALED POWER CORPORATION

Location Address: 2001 SANFORD STREET

City: MUSKEGON

State: MICHIGAN

Date of inspection: 3/6/85

Time of inspection (from) 9:30AM (to) 2:30PM

Person(s) interviewed

Title

Telephone

Mr DANIAH T. GIRUAN

ENVIRONMENTAL
ENGINEER

(616) 724-5235

Inspector(s)

Agency/Title

Telephone

DALE DEKRAKER

MICHIGAN DNR

(616) 456-5071

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

(A)

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments or incinerators	Q

Other activities

GENERATOR ☒

APPENDIX ☒ GN

TRANSPORTER ☒

APPENDIX ☒ TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	✓	<u>NO WASTES FROM FOREIGN SOURCES</u>
b. Facility expansion?	—	—	✓	<u>NO EXPANSIONS</u>
c. Change of owner or operator?	—	—	✓	<u>NO CHANGES HAVE OCCURED</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	<u>VERY BASIC, BUT ADEQUATE FOR COMPANY'S NEEDS</u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	<u>PLAN NOT AVAILABLE BUT BEING PREPARED.</u>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	✓	—	<u>MUST BE INCLUDED IN PLAN - COMPANY DOES RECEIVE WASTE SOLVENT STILL BOTOMS FOR RECLAIM.</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	✓	—	—	<u>BURNS SECURITY SERVICE</u>
or				
b. i. Artificial or natural barrier around facility?	✓	—	—	<u>FENCED</u>
and				
ii. Controlled entry?	✓	—	—	<u>24 Hour - 5 DAY OPERATION</u>
c. Danger sign(s) at entrance?	✓	—	—	_____
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓	—	—	_____

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

___ ☒ ___ NO FORMAL SCHEDULE EXISTS - WILL BE PREPARED

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

___ ☒ ___

ii. safety and emergency equipment?

___ ☒ ___

iii. security devices?

___ ☒ ___

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

___ ☒ ___

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

___ ☒ ___

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

___ ☒ ___

d. Are areas subject to spills inspected daily when in use?

☒ ___

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

☒ ___

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

☒ ___

ii. the name of the inspector?

___ ☒ ___ WILL BE ADDED

iii. a notation of the observations made?

☒ ___

iv. the date and nature of any repairs or remedial actions?

___ ☒ ___

5. Do personnel training records include: 265.16

a. Job titles?

☒ ___

b. Job descriptions?

☒ ___

4/82-A

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

___ ✓ ___

FACILITY INDOORS - NO HISTORIC LOSSES.

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

✓ ___

b. Telephone or 2-way radios at the scene of operations?

✓ ___

TELEPHONES

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ ___

ALL EQUIPMENT

Indicate the volume of water and/or foam available for fire control:

UNLIMITED SUPPLY FROM CITY AND WELLS

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ ___

TESTED QUARTERLY

b. Is emergency equipment maintained in operable condition?

✓ ___

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

✓ ___

TELEPHONES WITHIN 40'

5. Is there adequate aisle space for unobstructed movement?

✓ ___

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

✓ ___

FIRE DEPARTMENT
HOSPITAL

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓ — — WELL WRITTEN PLAN

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓ — —

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓ — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓ — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— — ✓ NATURE OF WASTE NOT LIKLY TO CAUSE AN EVACUATION.

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓ ✓ — NOT YET DISTRIBUTED TO OFF-SITE GROUPS, BEING PERFORMED.

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

☒ ☐ ☐

Mr JACK THOMPSON

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒ ☐ ☐

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒ ☐ ☐

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☐ ☐ ☒

PLAN HAS NEVER BEEN IMPLEMENTED.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>MANIFESTS SENT BACK TO OTHER SEALED POWER PLANTS</u>
b. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NO FORMAL OPERATING RECORD AVAILABLE</u>
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>ONLY ONE TANK</u>
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

___ ☒ ___

WILL INCLUDE MAP

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

☒ ___

v. Reports detailing all incidents that required implementation of the Contingency Plan?

___ ☒ ___

NO REPORTS - NEVER IMPLEMENTED

vi. All closure and post closure costs as applicable?

☒ ___

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

___ ☒ ___

OPERATING RECORD MISSING

F **Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

___ ☒ ___

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

- a. Is the facility closure plan available for inspection? ☒ ☐ ☐
- b. Does the plan identify:
 - i. maximum extent unclosed during facility life? ☒ ☐ ☐
 - ii. maximum hazardous waste inventory? ☒ ☐ ☐
 - iv. estimated year of closure? ☒ ☐ ☐
 - v. schedule of closure activities? ☒ ☐ ☐
- c. Has closure begun? ☐ ☒ ☐

PLAN IS QUITE BASIC AND COULD BE MORE SPECIFIC WITH RESPECT TO SCHEDULE OF CLOSURE EVENTS AND THE TIME REQUIRED FOR EACH STEP. COMPANY WILL BE UPGRADING PLAN.

2005 A.D.

*2. Post-Closure 265.118

- a. Is the post-closure plan available for inspection? ☐ ☐ ☒
- b. Does this plan contain:
 - i. description of groundwater monitoring activities and frequencies? ☐ ☐ ☐
 - ii. description of maintenance activities and frequencies for
 - AA. integrity of cap, final cover, or containment structures, where applicable ☐ ☐ ☐
 - BB. facility monitoring equipment ☐ ☐ ☐
 - iii. name, address, and phone number of person or office to contact during post-closure care period? ☐ ☐ ☐
- c. Has the post-closure period begun? ☐ ☐ ☐
- d. Is the written post-closure cost estimate available? 265.144 ☐ ☐ ☐

POST CLOSURE NOT REQUIRED

Applies only to disposal facilities.

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192

✓ — —

FOOL STILL BOTTOMS
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?

✓ — —

COVERED TANK - CONTAINED
3. Do continuous feed systems have a waste-feed cutoff?

— — ✓

BATCH ADDITION
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193

— — ✓

WASTES PLACED IN TANK ARE ALWAYS THE SAME
5. Are required daily and weekly inspections done? 265.194

✓ — —
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

— — ✓

NOT IGNITABLE OR REACTIVE
7. Are incompatible wastes stored in separate tanks? 265.199
 (If not, the provisions of 40 CFR 265.17(b) apply.)

— — ✓

NOT INCOMPATIBLE WASTES
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>35-40</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>SHORELINE WASTE TRANSPORTATION</u>
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>TRICIL ENVIRONMENTAL SERVICES</u>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>CORROSIVE ORM-A</u>
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>BULK DRUMS</u>
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WASTES PUMPED DIRECTLY FROM TANKS IN PROCESS
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NO FORMAL ACCUMULATION OF GENERATED WASTES IN TANKS

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

Appendix TR

YES NO NI Remarks

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

✓ COMPANY TRANSPORTS SOLVENTS TO ITS OWN FACILITY FOR RECLAIM.

✓ JUST FROM OTHER COMPANY PLANTS WITHIN THE U.S.

✓

✓

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

✓

25-30

25-30

✓

✓

Code: 3
Status: A
8/12/83 - olw

Sealed Power Corporation
100 Terrace Plaza
Box 299, Muskegon, MI 49443 Telephone 616-724 1, Telex 228464

SEALED POWER

RECEIVED

JUL 18 1983

HAZARDOUS WASTE DIVISION

July 15, 1983

Mr. Ronald C. Waybrant, Ph.D.
Department of Natural Resources
350 Ottawa Avenue, N. W.
Grand Rapids, MI 49503

MI D 980 499 735

Dear Mr. Waybrant:

In response to your letter of May 2, 1983, we have taken steps to correct the three problems that were identified during our RCRA inspection of April 28, 1983.

In reference to item #1, we are conducting an investigation with both our own personnel department and the University of Michigan to establish both a training program and a records system for all individuals that may handle hazardous waste. For item #2, we are currently receiving bids from several consulting firms for the purpose of building a contingency plan for the Sanford Street facility. In the past, we have prepared these plans with our own in-house staff, but our present work load just does not allow time to continue this practice. For item #3, the tank containing the hazardous still bottoms was labeled the day of the inspection, and we achieved compliance with this requirement on April 28, 1983.

I will attempt to update the progress of these efforts as new information becomes available, and I hope that we will be allowed the time to establish these programs. If you have any questions that I can be of any additional assistance, please contact me.

Sincerely,

Dan Girvan

Daniel T. Girvan, P.E.
Environmental and Energy
Manager

0275/mtm

cc: D. DeKraker

XC EPA REGION IV
COMPLIANCE SECTION - LANSING ✓

NATURAL RESOURCES COMMISSION

JACOB A. HOFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

350 Ottawa Avenue, N. W.
Grand Rapids, Michigan 49503

May 2, 1983

EPA

STAT

#

NEEDED

5

Mr. Daniel T. Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443:

MID 980499735

Dear Mr. Girvan:

On April 28, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 3001 Sanford Street in Muskegon, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. The completed RCRA inspection forms are enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

1. Personnel training records are not available as required in 40 CFR, Part 265.16.
2. The Contingency Plan and Emergency Procedures are not available as required in Part 265, Subpart D.
3. The tank containing hazardous still bottoms from the reclamation of trichloroethylene was not labeled with the term "Hazardous Wastes" as currently required in Part 262.34(3).

We request that you respond to this letter by May 28, 1983, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact Dale DeKraker at (616) 456-5071.

Sincerely,

HAZARDOUS WASTE DIVISION

Ronald C. Waybrant, Ph.D.
District Supervisor

RCW:bjc
cc: J. Bohunsky
EPA Reg. V (w/enc.)
enc.

Action 3
Code X

ES 6-23-83

RCRA Inspection Report

EPA Identification Number: M I D 9 8 0 4 9 9 7 3 5

Installation Name: SEALED POWER CORPORATION

Location Address: 3001 SANFORD STREET

City: MUSKEGON

State: MICHIGAN

Date of inspection: 4/28/83

Time of inspection (from) 10:00AM (to) 12:00PM

Person(s) interviewed

Title

Telephone

DANIAL GIVAN

ENVIRONMENTAL
ENGINEER

(616) 724-5011

Inspector(s)

Agency/Title

Telephone

DALE DEKORER

MICHIGAN DNR
WATER QUALITY
SPECIALIST

(616) 456-6231

Installation Activity (mark only one box)

Inspection Form(s)

☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☒ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>50</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)	<u>X</u>			
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>			
c. Name and EPA ID number of transporter(s)?	<u>X</u>			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			<u>HAZARD CLAS</u>
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			<u>MISSING ON</u> <u>SITE</u>
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	___	___	___
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>X</u>	___	___	___
(3) If required, are placards available to transporter? 262.33	<u>X</u>	___	___	___
** (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>	___	___	___
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>X</u>	___	___	___
ii. Have more than 90 days elapsed since the dates marked?	___	<u>X</u>	___	___
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>X</u>	___	___	___
iv. Are containers in good condition?	<u>X</u>	___	___	___
v. Are containers compatible with waste in them?	<u>X</u>	___	___	___
vi. Are containers managed to prevent leaks?	<u>X</u>	___	___	___
vii. Are containers stored closed?	<u>X</u>	___	___	___
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>	___	___	___
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	___	___	<u>X</u>	<u>NOT IGNITABLE OR REACTIVE</u>

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	___	___	___
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>X</u>	___	___	___
(3) If required, are placards available to transporter? 262.33	<u>X</u>	___	___	___
** (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>	___	___	___
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>X</u>	___	___	___
ii. Have more than 90 days elapsed since the dates marked?	___	<u>X</u>	___	___
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>X</u>	___	___	___
iv. Are containers in good condition?	<u>X</u>	___	___	___
v. Are containers compatible with waste in them?	<u>X</u>	___	___	___
vi. Are containers managed to prevent leaks?	<u>X</u>	___	___	___
vii. Are containers stored closed?	<u>X</u>	___	___	___
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>	___	___	___
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	___	___	<u>X</u>	<u>NOT IGNITABLE OR REACTIVE</u>

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			X	
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			X	
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)	X			FOOT STILL BOTTOMS
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)		X		
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192		X		
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?			X	NOT OPEN TOP
iv. Do continuous feed systems have a waste-feed cutoff?			X	BATCH SYSTEM
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193			X	WASTE ALWAYS F-001
vi. Are required daily and weekly inspections done? 265.194		X		
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198			X	
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199			X	

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

N/A

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ X _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- i. Job Titles?
ii. Job Descriptions?
iii. Description of training?
iv. Records of training?
v. Did personnel receive the required training by 5-19-81?
vi. Do new personnel receive required training within six months?
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

_____ X _____
_____ X _____
_____ X _____ DESCRIPTION EXISTS BUT NOT INCLUDED IN ANY KIND OF FORMAL RECORD.
_____ X _____
_____ X _____
_____ X _____
_____ X _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ X _____

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?		<u>X</u>		
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.		<u>X</u>		
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?		<u>X</u>		
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)			<u>X</u>	WASTE WOULD NOT REQUIRE AN EVACUATION PLAN
vi. Are copies of the Contingency Plan available at site and local emergency organizations?		<u>X</u>		KEEP ON SITE OK
vii. Is the facility emergency coordinator identified?		<u>X</u>		MR. GIBBON
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>			
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>			
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?			<u>X</u>	NO EMERGENCY HAS EVER EXISTED

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	<u>X</u>	___	___	<u>TELEPHONES</u> <u>FIRE ALARMS</u>
Telephone or 2-way Radios at the scene of operations?	<u>X</u>	___	___	___
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>X</u>	___	___	<u>SODIANTS</u>

Indicate the volume of water and/or foam available for fire control:

UNLIMITED CITY WATER

BULK CO₂

iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	___	___	<u>ALL TESTED</u> <u>QUARTERLY</u>
Is emergency equipment maintained in operable condition?	<u>X</u>	___	___	___
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X</u>	___	___	___
v. Is there adequate aisle space for unobstructed movement?	<u>X</u>	___	___	___
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u>X</u>	___	___	<u>FIRE DEPT</u> <u>WASTE HAULEDS</u>

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	___	<u>X</u>	___	<u>COMPANY HAS A</u> <u>RIPP BUT IT</u> <u>DOT CONTAIN A</u> <u>IF THE REQUIR</u> <u>ITER</u>
--	-----	----------	-----	---

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X _____

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

_____ X _____

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing? _____

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____

iii. Met the Manifest requirements? _____

b. Importing Hazardous Waste, has the generator met the manifest requirements? _____

1

Inspection Form C

YES NO NI Remarks

Section A: SCOPE OF INSPECTION

1. Complete this inspection form for transporters of hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container.

X

X

X

X

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

X

X

12

X

X

18

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
CARL T. JOHNSON
F. LAITALA
Y. F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building
350 Ottawa N. W.
Grand Rapids, Michigan 49503
Phone: 456-6232

April 15, 1982

ED
A

Mr. Dan Girvan
Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443

Dear Mr. Girvan:

On March 17, 1982, staff of the Department of Natural Resources conducted an investigation of your facility located at 2001 Sanford Street in Muskegon, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. The completed RCRA inspection form is enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

1. Personnel training records are not available as required in 40 CFR 265.16(b) and 265.16(d), (3) and (4).
2. A contingency plan and emergency procedures were not provided as required in 40 CFR 265.51 through 265.56.
3. Inspections required in 40 CFR 265.194(a), (4) and (5).

We request that you respond to this letter by May 10, 1982 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter please feel free to contact me at (616) 456-6232.

Sincerely,

WATER QUALITY DIVISION

John Bantjes
Water Quality Specialist

RECEIVED

APR 21 1982

JB/inam

CC: Al Howard, Office of Hazardous Waste Management, Env. Services Division

EPA Region V

John Bohunsky, Water Quality Division



Enclosure

STATE IDENTIFICATION NUMBER
(If Applicable)

1111 270 011 520
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: San Jose State University
(B) Street: 2001 San Jose St
(C) City: San Jose (D) State: CA (E) Zip Code: 95143
(F) Phone: 415-734-3200 (G) County: San Jose
(H) Date of Inspection: 3-17-81 Time of Inspection (From) 9:30 (To) 12:00
(I) Weather Conditions: Clear, 40°F

(J) Person(s) interviewed	Title	Telephone
<u>John C. ...</u>	<u>...</u>	<u>415-734-3200</u>
<u>...</u>	<u>...</u>	<u>415-734-3200</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>...</u>	<u>...</u>	<u>415-734-3200</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>John C. ...</u>	<u>...</u>	<u>415-734-3200</u>

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10-01-1980 10-01-1980 10-01-1980
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of Generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

- | | | | | |
|--|-------|-------|-------|-------|
| 5. The description of the waste(s)
(DOT shipping name, DOT hazard
class, DOT identification number)? | _____ | _____ | _____ | _____ |
| 6. The total quantity of waste(s) and
the type and number of containers
loaded? | _____ | _____ | _____ | _____ |
| 7. Required Certification? | _____ | _____ | _____ | _____ |
| 8. Required Signatures? | _____ | _____ | _____ | _____ |
| (C) Does the Owner or Operator Submit
Exception Reports when Needed? | _____ | _____ | _____ | _____ |

IV. PRE-TRANSPORT REQUIREMENTS

- | | | | | |
|---|-------|-------|-------|-------|
| (A) Is waste packaged in accord-
ance with DOT Regulations?
(Required prior to movement
of hazardous waste off-site) | _____ | _____ | _____ | _____ |
| (B) Are waste packages marked and labeled
in accordance with DOT Regulations
concerning hazardous waste materials?
(Required prior to movement of
hazardous waste off-site) | _____ | _____ | _____ | _____ |
| (C) If required, are placards available
to transporter? | _____ | _____ | _____ | _____ |
| (D) Pre-shipment Accumulation: | | | | |
| 1. Are containers marked with
start of accumulation date? | | | | |
| 2. Are the containers of hazardous
waste removed from installation
before they can accumulate for
more than 90 days? | | | | |

*Not Inspected

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line?

Not Inspected

4. If wastes are stored in tanks, are the tanks managed according to the following requirements:

a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?

b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?

NA

c. Do continuous feed systems have a waste-feed cutoff?

NA

d. Are required daily and weekly inspections done?

✓

Not Inspected

e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements)

Is waste ☐ Ignitable or ☐ Reactive?

NA

f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)

NA

g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reaction wastes?

NA

Record the following information:

Tank capacity? 28,000 gallons

Tank diameter? 20.0 feet

Distance of tank from property line? 100 feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	*N	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<input checked="" type="checkbox"/>			
2. Job Descriptions	<input checked="" type="checkbox"/>			
3. Description of training?	<input checked="" type="checkbox"/>			Review Personnel
4. Records of training?	<input checked="" type="checkbox"/>			
5. Have facility personnel received required training by 5-19-81	<input checked="" type="checkbox"/>			Facility personnel have received training
6. Do new personnel received required training within six months	<input checked="" type="checkbox"/>			NA None Hired
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility.				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	<input checked="" type="checkbox"/>			

2. If required, does this facility have the following equipment:

- a. Internal communications or alarm systems?
- b. Telephone or 2-way Radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	A.D.T. & TELEPHONE
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	CELLS HAVE RADIO'S
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Indicate the volume of water and/or foam available for fire control

Units: 1000000 GALLONS SUPPLY
FROM C.C. SYSTEM

3. Testing and Maintenance of Emergency Equipment:

- a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	TESTING - LOG BOOK BY PLANT ENGINEER

- b. Is emergency equipment Maintained in Operable Condition?

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

- 4. Has Owner/Operator provided immediate access to internal alarms (if needed)?

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

- 5. Is there adequate aisle space for unobstructed movement?

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

Required	Inspected	Remarks
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NOT DEVELOPED FORMS PARTS EXIST

2. Are copies of the Contingency Plan available at site and location Emergency Organizations?

3. Emergency Coordinator

a. Is the Facility Emergency Coordinator Identified?

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan

4. Emergency

If an emergency situation has occurred at this facility; has the emergency coordinator followed the emergency procedures listed in §265.55?

PLANT ENGINEER

PLANT ENGINEER

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?

(B) Has the Generator submitted Annual Reports and Exception Reports as required?

PLANT ENGINEER

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

(A) Has the Installation Imported or Exported Hazardous Waste?

✓

VIII. Remarks

REMARKS: SEALED POWER CORPORATION IS IN THE
PROCESS OF ACQUIRING EQUIPMENT TO RECLAIM SOLVENTS
THAT FORMERLY WOULD BE DISPOSED OF OFF SITE
THIS IS TO SATISFY THE INTENT AND PURPOSE OF RCRA
BY CONSERVING MATERIAL THROUGH RECOVERY.
THE NEWER EQUIPMENT WILL BE INSTALLED AT THE
CORPORATE ST PLANT AND WILL BE USED TO RECLAIM
MATERIALS ON A CORPORATE SCALE

SEALED POWER

August 31, 1981

Director
Region V EPA
P. O. Box 7861
Chicago, IL 60680

Dear Sir:

Re: Interim Status Compliance for Hazardous Waste
Facilities

During August of 1980, Part A (Hazardous Waste Facility Applications) were submitted for five Sealed Power manufacturing facilities. At that time, the regulations being adopted by the EPA seemed to indicate that each of these plants may ultimately be regulated as a hazardous waste treatment facility. Since this possibility did exist and since the penalty for not filing a Part A by the required date could have been curtailment of our manufacturing operations, we felt that it was good insurance to submit these Part A's. Later we could determine their true applicability as the additional rules were put in place and as the way in which the rules would be interpreted became more clear.

Since that date, we have monitored the continuing application of the RCRA rules and have closely studied how these rules affect our manufacturing facilities. It is now our opinion that none of these five facilities is, in fact, a hazardous waste treatment, storage, or disposal facility, and we request that they be removed from the system. Each of these facilities along with the rest of our manufacturing plants will continue to be involved with the RCRA rules as hazardous waste generators, and we feel they will be adequately regulated as such. In addition to RCRA rules, each of these facilities operates under and is regulated by NPDES programs, air quality permits, industrial pretreatment standards, State, County, and City discharge ordinances, and Michigan Act 64 Rules.

By this letter we wish to cancel the Part A applications for the five facilities listed below:

<u>Plant</u>	<u>I.D. #</u>
Sanford Street	MTT270010580 (MID006024129)
Hy-Lift #1	MID060174125
Harvey Street	MID043682327
Dowagiac	MID078920121
St. Johns	MTD005515614

Director - Region V EPA
August 31, 1981
Page 2

If any additional information is required or if there is a formal process that we should use, please contact me and we will provide whatever assistance is needed.

Sincerely,

SEALED POWER CORPORATION

Daniel T. Girvan

Daniel T. Girvan
Environmental Engineer

mtm